

**Patrick B. Donohue, JD, MBA**  
*55 West 116th Street - #159*  
*New York, NY 10026*

October 15, 2021

**VIA EMAIL:** [TEMPORARY PRO SE FILING@NYSD.USCOURTS.GOV](mailto:TEMPORARY PRO SE FILING@NYSD.USCOURTS.GOV)

Hon. Stewart D. Aaron  
Magistrate Judge  
Southern District of New York  
500 Pearl Street  
New York, New York 10007

**Re:** United States of America and State of New York, ex  
rel. Patrick Donohue v. Richard Carranza, et al.  
*20-CV-05396 (GHW)(SDA)*

Dear Magistrate Judge Aaron:

As Your Honor is aware, the undersigned is the Relator in the above-referenced matter.

The undersigned filed the Amended Complaint with supplemental exhibits on September 29, 2021, in person at the Court's Pro-Se Office. In addition to the Amended Complaint, the undersigned also requested a Summons for each Defendant – none have been issued to date.

Apparently, my proceeding pro se, as an attorney, has complicated filing documents with the Court. I have been instructed to request an Order from Your Honor, allowing the Clerk to issue me "pro se" credentials for this matter. In this way, my current filing will not be associated in any way with my position at the Brain Injury Rights Group, Ltd. If I were to file any documents electronically on my own behalf, the docket would reflect that I am being represented by the aforementioned non-profit law firm when I am not.

Allowing the Clerk to grant me a second set of filing credentials, for this case only, will significantly simplify future communication and filing with the Court.

To that end, while I submitted the appropriate Requests for Summonses to the Clerk's office back in September, no Summonses have been issued. Once again, the Clerk's office directed the undersigned to submit a letter to Your Honor requesting an Order directing the Clerk to issue the Summonses.

Currently, service is to be made upon Defendants on or before October 25, 2021; and appropriate proof of service is to be filed with the Court on or before November 8, 2021.

The undersigned respectfully requests an extension of time to serve the Defendants as service has not been possible to date, without a Summons to accompany the Complaint. Relator requests the Court to allow the following:

- Relator shall serve the Second Amended Complaint upon Defendants on or before November 19, 2021;
- Relator shall file appropriate proof of service with the Court via ECF on or before December 6, 2021.

The undersigned thanks the Court for its attention and consideration to this matter.

Respectfully Submitted,

/s/ Patrick B. Donohue  
PATRICK B. DONOHUE, ESQ.  
55 W 116<sup>th</sup> Street – Suite 159  
New York, NY 10026  
(917) 359-4556